

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NANCY LIN, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

LIBERTY HEALTH SCIENCES
INC., GEORGE SCORSIS, RENE
GULLIVER, and VIC NEUFELD

Defendants.

Case No. 1:19-cv-00161

ECF CASE

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Pursuant to Fed. R. Civ. P. 23(e), Lead Plaintiff Nancy Lin and Plaintiff Gilbert Lee Silverbird (collectively, "Plaintiffs"), individually and on behalf of all Settlement Class Members, hereby move this Court for an order: (i) Preliminary Approval of the Proposed Settlement (the "Settlement"); (ii) conditional certification of the Settlement Class; (iii) approval of the Notice to the Settlement Class; and (iv) a date for a Settlement Hearing, deadlines for mailing and publication of the Notice, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Lead Plaintiffs' motion for Final Approval of the Settlement, and the filing of Lead Counsel's application for attorneys' fees and expenses.

This motion is based upon the accompanying Memorandum of Law, the Declaration of Cara David and the exhibits thereto, which are filed contemporaneously herewith, and other such matters and argument as the Court may consider at the hearing on this motion.

Significantly, no defendant opposes the relief sought by this motion.

Dated: January 8, 2021

Respectfully submitted,

POMERANTZ LLP

By: /s/ Cara David

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CERTIFICATE OF SERVICE

I hereby certify that on this, the 8th day of January, 2021, a true and correct copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Cara David
Cara David